NATIONAL CATTLEMEN'S BEEF ASSOCIATION
1301 Pennsylvania Ave., NW, Suite #300 • Washington, DC 20004 • 202-347-0228 Fax 202-638-0607

29

Comments

on behalf of the

NATIONAL CATTLEMEN'S BEEF ASSOCIATION

in regard to

The Food Safety Initiative Strategic Plan
Docket #98-045N

submitted to

U.S. Department of Agriculture
Food Safety Inspection Service
The Honorable Catherine E. Woteki

submitted by:
Lynn L. Kosty
Associate Director of Food Policy

December 29, 1998

Initiated in 1898, the National Cattlemen's Beef Association is the marketing organization and trade association for America's one million cattle farmers and ranchers. With offices in Denver, Chicago and Washington D.C., NCBA is a consumer-focused, producer-directed organization representing the largest segment of the nation's food and fiber industry.

The National Cattlemen's Beef Association (NCBA) appreciates the opportunity to provide our views on food safety regulation. We encourage the United States Department of Agriculture (USDA) to continue to involve ranchers and farmers in the process of developing food regulation and obtainable, effective food policy.

Since the establishment of the Federal Meat Inspection Act of 1906, the primary food safety concerns for meat and poultry were resolved through meat inspection. The focus of the inspectors had been to prevent diseased animals, and meat prepared under unsanitary conditions, from entering commerce. The system has been effective in preventing those actions. As time passed, other legislation, such as The 1957 Poultry Products Inspection Act, and the Wholesome Meat Act of 1967, were enacted to expand regulatory enforcement to other animal species, and state inspected facilities.

Meat industry experts, as well as the USDA recognize that food safety concerns can no longer be limited to physical concerns, such as diseased animals and unsanitary facilities. With time, we have become skilled at identifying other food safety concerns such as, chemical residues and microbial contaminants. The challenge is to develop technologies to eliminate such contaminants, while they themselves continue to evolve. A difficult task at best.

The USDA and the meat industry have been working to meet that challenge. Over the past decade, meat and poultry inspection has undergone several significant changes. Most notable is the implementation of the Hazard Analysis and Critical Control Point (HACCP) system. The system was first implemented in the seafood industry under the direction of the Food and Drug Administration (FDA) in 1995. The USDA quickly followed suit in 1996, requiring HACCP for all meat and poultry plants to be implemented over a three year time period. HACCP is intended to prevent hazards, whether physical, chemical, or microbial, from entering the food supply. HACCP systems require processors to follow a set plan, and monitoring the critical steps of the plan to verify that the system is working. This is a step in the right direction.

We encourage the USDA to take advantage of this new inspection system. In order to do so, prior inspection techniques, such as carcass by carcass inspections must be evaluated to determine whether they are beneficial. Carcass-by-carcass inspections do not prevent chemical or microbial contaminants from entering commerce. Veterinarians and trained facility employees may be able to perform more of the traditional duties of inspectors under the HACCP System. This may help to minimize the use of government dollars. Food Safety Inspection Service (FSIS) dollars and employees may be more useful in other areas where fewer dollars and inspectors are currently allocated (i.e. imported products, fruit and vegetable inspection).

The FSIS employs more than 8,000 field inspectors and supervisors to inspect approximately 6,500 facilities. The Department spent approximately $100 thousand dollars per inspected facility in fiscal year 1998. On the contrary the FDA was allocated a meager $4 thousand dollars on food safety inspection for the same time period. The NCBA would encourage the USDA to perform risk-assessments to establish what the most critical food safety risks are. Dollars should be distributed to the various agencies according to the respective risks of the foods they regulate.

Risk-assessments must be based on strong science. An assessment based on weak or no science, is no more than an organized, costly, guess. Although the agencies are pressured to release estimates of relative risk by media and consumer groups, NCBA would encourage USDA to take the time necessary, and invest the necessary funds to come up with realistic risk-assessments. Poor risk-assessments are likely to either greatly under or over-estimate the risk from consuming specific products. An over-estimation of risk has the ability to have large negative consequences on food producers, and under-estimations have the ability to encourage poor food-handling practices by over-confident consumers.

NCBA believes in a farm-to-table approach to producing safe food. No one sector of food production should be entirely responsible for preventing food hazards. Minimization of hazards should begin with sound farm-management and continue through processing, distribution, retail, and consumer handling. However, more research is needed before we know how to minimize hazards in all sectors of the production chain. More particularly, although on-farm research is necessary, it is important to realize that as we modify our management practices, microbial contaminants will continue to evolve. This leads to continuous changes in our techniques to combat new organisms. Increases in foreign trade and travel provide greater opportunities for new organisms to make their way into our food supply. Processing technologies are the best defense we have against pathogens at this time. Rapid review of newly developed processing technologies is essential in assisting the food industry in minimizing risk. Thus, while conducting research on-farm, in distribution, and in retail settings, we must continue to develop new processing technologies and educate consumers on safe handling practices.

The National Academy of Sciences (NAS) issued a report in August of 1998, to address concerns over food safety coordination between government agencies. The report recommended that the development of a single food safety agency could help resolve some of the major concerns. Creation of a central organization could be useful. However, jurisdiction over current agencies by different congressional bodies could prevent creation of this type of agency. NCBA supports the development of a single meat, poultry, and seafood inspection system within the Department of Agriculture. A single inspection agency would have the ability to oversee inspection across all food products, ensuring their equity. Achieving national food safety goals requires a farm-to-table strategy. The Department of Agriculture already manages a range of farm-to-table regulatory, research and education agencies with responsibilities and expertise in food safety. The Department logically represents the most appropriate department to either

manage a single food safety agency or coordinate an interagency council such as the President's Council on Food Safety.

President Clinton has recognized the need for collective action in combating food hazards. The NAS report led the President to establish the President's Council on Food Safety in order to: (1) develop a comprehensive strategic federal food safety plan; (2) advise agencies of priority areas for investment in food safety and ensure that federal agencies annually develop coordinated food safety budgets; and (3) oversee the Joint Institute for Food Safety Research and ensure that it addresses the highest priority research needed. We believe that this council could be very effective in providing greater coordination, and limiting duplication of research efforts between agencies.

Product safety is NCBA's number one concern. Consumers must be confident in the safety of beef in order to purchase it. NCBA has and will continue to fund various research projects, to assure the continued production of quality, safe, beef. Over the past five years, as an industry, we have invested greater than $1.7 million annually in *E.coli* O157:H7 research alone. In 1993, cattle producers established the Blue Ribbon Task Force, composed of the best scientific and technical minds in the meat industry. The task force sought to study *E.coli* O157:H7 and identify ways to prevent the presence and growth of this harmful bacteria. In 1997, we established the Beef Industry Food Safety Council (BIFSCo) headed by NCBA CEO, Chuck Schroeder.

> BIFSCo is committed to developing industry-wide, science-based strategies to solve the problem of *E.coli* O157:H7 and other foodbome pathogens in beef. The Council will accomplish this by identifying funding and prioritizing research priorities from farm to table; developing programs to help industry segments operate in today's business environment; speaking with one voice in seeking regulatory and legislative solutions; developing consumer education programs; and developing and implementing industry information programs to assist in the transfer of technology into the market place.

NCBA has incorporated its farm-to-table research initiatives with those of the BIFSCo. BIFSCo has identified it's five top priority research projects as follows:

1. Gain a better understanding of the host/pathogen relationship to aid in the identification of potential pre-harvest critical control points and intervention strategies *(Pre-harvest segment).*
2. Identify production and management practices that influence the growth, shedding, and spread of *E coli* O157:H7 *(Pre-harvest segment).*
3. Develop sampling and testing protocol and recommend to the industry that microbiological testing is integral for verification of processing steps before grinding of trim into ground beef *(Ground beef segment).*
4. Develop Irradiation guidelines for ground beef products *(Ground beef segment).*
5. Gain a better understanding of the biology and ecology of *E.coli* O157:H7 *(Pre-harvest segment).*

NCBA plays an active role in the BIFSCo initiative and will continue to work to solve the *E.coli* O157:H7 problem through scientific research and consumer education. As a founding member of the Partnership for Food Safety Education, NCBA works with other food producers, processors, and retailers to convey the importance of safe handling to consumers through educational campaigns such as *Fight Bac*.

NCBA encourages USDA to continue to work with the beef and meat producers, processors, and retailers to find solutions to food safety problems. Although eliminating sources of food hazards will be challenging, it is possible to achieve minimal risk through cooperative efforts beginning on the farm and concluding in the hands of the consumer.